

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

DECLARATION OF JOHN ROBINSON

I, John Robinson, declare as follows:

1. I am an attorney at Jacobson Lawyers Group, PLLC and am counsel for Plaintiffs in the above-captioned case. I submit this declaration in support of Plaintiffs' motion for a preliminary injunction.
2. Exhibit 1 is a true and correct copy of the organization chart for the National Endowment for the Humanities, as of January 1, 2025.
3. Exhibit 2 is a true and correct copy of NEH's Fiscal Year 2024 Performance and Accountability Report.
4. Exhibit 3 is a true and correct copy of the American Council of Learned Societies' award for a project titled, "ACLS/NEH National Convening for Graduate Education in the Humanities."
5. Exhibit 4 is a true and correct copy of ACLS's award for a project titled, "ACLS China Studies Research Fellowships 2024-2027."

6. Exhibit 5 is a true and correct copy of the American Historical Association's award for a project titled, "Change across the Land: Nineteenth- and Twentieth-Century United States Environmental History and Policy."

7. Exhibit 6 is a true and correct copy of AHA's award for a project titled, "Africa in World History."

8. Exhibit 7 is a true and correct copy of the Modern Language Associations' award for a project titled, "Reimagining Humanities Coursework for Career Readiness: A Virtual Workshop for Teachers of Languages and Literature."

9. Exhibit 8 is a true and correct copy of MLA's award for a project titled, "The Current and Future State of Humanities Data."

10. Exhibit 9 is a true and correct copy of a notice of grant termination, dated April 2, 2025, sent to ACLS.

11. Exhibit 10 is a true and correct copy of a document titled, "Guidance for Recipients of Terminated NEH Awards," dated April 29, 2025.

12. Exhibit 11 is a true and correct copy of an email chain between Jason Harshman, Deputy Director of the Division of Education Programs at NEH, and AHA, dated April 4, 2025.

13. Exhibit 12 is a true and correct copy of an email from institutes@neh.gov, dated April 4, 2025.

14. Exhibit 13 is a true and correct copy of the Notice of Funding Opportunity for "National Garden of American Heroes: Statues."

15. Exhibit 14 is a true and correct copy of the websites for the 19 NEH grant programs that have been canceled.

16. Exhibit 15 is a true and correct copy of an April 24, 2025 NEH press release titled, "An Update on NEH Funding Priorities and the Agency's Recent Implementation of Trump Administration Executive Orders."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2025 in Washington, D.C.

/s/ John Robinson
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